

Said period of possession is in excess of twenty (20) years, and for a period of greater than twenty (20) years the Plaintiff and her predecessors in title have been in actual peaceable, open, hostile, exclusive, notorious, and adverse possession of the Property, under claim of right. The Plaintiff's title to the Property has been denied and disputed by the above named Defendant, Paul E. Rippeon. This denial and dispute of the Plaintiff's title to the Property was communicated to the Plaintiff in or about February, 1986. In spite of repeated requests, demands and notices from the Plaintiff and her agents to the said Defendant, the said Defendant and his lessees and assigns have repeatedly attempted to interfere with and have interfered with the Plaintiff's possession of the Property, which interference continues through the date of filing this Complaint.

5. For the entire period of possession of the Property by the Plaintiff and her predecessors, said possession has consisted of the exclusive use of the Property by the Plaintiff, her predecessors in interest, and the legal invitees and tenants of the Plaintiff and her predecessors as a parking area serving the building located on the immediately adjoining property known as 202 College Avenue, Frederick County, Maryland. During such time, and continuously and uninterruptedly, the Plaintiff and her predecessors in title have exercised exclusive dominion and control over the Property.

6. The Defendant's repeated and continuous interference with the Plaintiff's possession of the Property